

**PLAINTIFFS' REBUTTAL DESIGNATION OF JAMES NEKU**

*(Counter-Designations in italicized text)*

**Deposition October 25-26, 2004**

**Volumes 1 and 3**

<b>Page/Line Cite</b>	<b>Objection (include specific page and line numbers of material objected to and objection(s))</b>	<b>Response</b>	<b>Resolution</b>
260:20-262:2			
379:21-25			
380:13-381:2	Outside the scope of rebuttal. The only rebuttal testimony which plaintiffs are introducing from this testimony establishes that Neku did not observe the shooting of the Illaje protestors and that the <b>barge</b> <del>helped</del> <i>was not blocked</i> . Defendants' counter-designations cover an entirely different topic concerning the <b>platform</b> .		